

Shorter, Chere

From: agreene@cal-olive.com%inter2 [agreene@cal-olive.com] on behalf of agreene@cal-olive.com
Sent: Friday, November 19, 2004 9:29 AM
To: Shorter, Chere
Subject: New Olive Oil Standards - Comments

California Olive Ranch (COR) strongly endorses the USDA - FDA adoption of standards for olive oil that are aligned with the International Olive Oil Council (IOOC).

As the grower of the largest olive oil orchard in the United States and representing other olive growers who supply their fruit to COR for processing and marketing, COR respectfully requests a level playing field. We are asking for a playing field that is fair first for the consumers, and second for growers and processors in the United States and around the world.

US olive oil consumption has more than doubled in the last ten years with almost all of the olive oil consumed imported from countries who willingly subscribe to the IOOC standards. Yet those standards do not restrict the export to the US of substandard oil as established by those same standards. Some US producers have been forced to meet price competition through the use of misleading labeling practices. The losers are consumers who pay too much for low grade oil and quality US growers and processors attempting to compete in the marketplace.

The adoption of IOOC standards will create assurances for retailers and the US consumers that regardless of the brand or country of origin, the money paid at the checkout stand is for the grade of oil represented on the packaging. At the same time IOOC aligned standards will open the door for US growers and processors to export our products in the global marketplace in a manner consistent with the other major olive growing countries.

Sincerely,
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